

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

UNITED STATES OF AMERICA

v.

DUSTIN J. OLIVER  
SHAUN MICHAEL SIMMONS  
[REDACTED]

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Criminal No. M-22-1143-S1

**SEALED SUPERSEDING INDICTMENT**

**THE GRAND JURY CHARGES:**

**Count One**

On or about June 14, 2022, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

DUSTIN J. OLIVER  
SHAUN MICHAEL SIMMONS  
[REDACTED]

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to import into the United States of America from the United Mexican States a controlled substance. The controlled substance involved was 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 963, 952(a), 960(a)(1) and 960(b)(1).

**Count Two**

On or about June 14, 2022, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

DUSTIN J. OLIVER  
SHAUN MICHAEL SIMMONS  
[REDACTED]

did knowingly and intentionally import into the United States of America from the United Mexican

States a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 22 kilograms of a mixture or substance containing a detectable amount of Cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(1) and Title 18, United States Code, Section 2.

**Count Three**

On or about June 14, 2022, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**DUSTIN J. OLIVER  
SHAUN MICHAEL SIMMONS**

[REDACTED]

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

**Count Four**

On or about June 14, 2022, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**DUSTIN J. OLIVER  
SHAUN MICHAEL SIMMONS**

[REDACTED]

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 22 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

A TRUE BILL.

FOREPERSON

JENNIFER B. LOWERY  
UNITED STATES ATTORNEY

Alex D. Paul  
ASSISTANT UNITED STATES ATTORNEY